9 Twin Orchard Drive Oswego, NY 13126 October 23, 2004

Mr. James L. Caldwell US Nuclear Regulatory Commission Suite 210 2443 Warrenville Road Lisle, IL 60532-4352

Dear Mr. James L. Caldwell:

Here are some questions for the November 12th Region I and Region III meeting with FENOC corporate people.

Davis-Besse Related

1. Was the decision to repair Davis-Besse a cost-effective one for the people of Ohio?

Was the cost of recently sold operable U.S. nuclear power plants compared to the sum of (then) present book value plus maximum allowable cost of repairs? Would a combined cycle gas/multifuel turbine(s) have been a better solution? With an expected time to failure of the present replacement reactor head of, I believe, 6 to 8 years, how costly is the Davis-Besse generated electricity on a per kw-hr basis if the repair cost is spread out over the expected generation for the realistic life of the plant machinery (not length of present license)? (That is, consider the repair cost as an operating expense, not an addition to capital expense.)

- 2. Do you find the Davis-Besse outage information presented in the last Annual Report to Shareholders sufficiently accurate?
- 3. At Davis-Besse, with no FENOC experience in the installation and operation of the leak detecting FLUZ system, it was NOT installed at the upper reactor head as recommended by the vendor. Does this decision seem to be the right one? (Consider that the discovered damage was at the upper reactor head.)
- 4. After 11 months of (non-continuous(?)) outage work and over 1 million dollars spent on the sump/strainer modification, it was found that the water to be supplied to the High Pressure Injection (HPI) pumps would be of inadequate quality. Then the HPI pumps also had to be modified. Is this typical of FENOC corporate management of engineering? What was the Quality Assurance involvement, if any?
- 5. On the whole, would you evaluate INPO advice for maintenance and operations for the two years before the shutdown as helpful or not?

6. Now that the industry has had a chance to see that the Davis-Besse machinery is operable, why do you think that the NRC should not pull your license for this plant until it is sold?

Perry Related

- 1. Do you presently operate the Emergency Service Water pumps in accordance with the latest vendor manual requirements for:
- a. position of pump discharge isolation valve at pump startup?
- b. pump venting before further opening of that same valve?

Beaver Valley Related

None

Three Mile Island, Unit 2

None

No reply needed.

Thank you,

Tom Gurdziel

Copy:

USNRC Deputy Region I Administrator James T. Wiggins US Representative Dennis J. Kucinich Union of Concerned Scientists David Lochbaum Ohio Governor Bob Taft USNRC Inspector General Hubert T. Bell

From:

"Tom Gurdziel" <tgurdzie@dreamscape.com>

To:

<opa3@nrc.gov>

Date:

10/24/04 6:29PM

Subject:

November 12th Meeting with FENOC

Good morning Jan,

Please give the attached to Mr. Caldwell.

Thank you,

Tom

CC: "Richard W. Lamoreaux" <lamoreauxrw@yahoo.com>, "Rep. Marcy Kaptur" <REP.KAPTUR@mail.house.gov>, "James M. Trapp" <jmt1@nrc.gov>, "J. Mangels" <jmangels@plaind.com>, "J. Funk" <jfunk@plaind.com>, "Ed Stronski" <ESTRONSKI@aol.com>, "David Lochbaum" <dlochbaum@ucsusa.org>